

REMARKS/ARGUMENTS

Reconsideration and allowance of the present application based on the following remarks are respectfully requested. Claims 19 and 21-29 are pending

Claim 19 has been rejected under 35 U.S.C. §102(b) as anticipated by GB 1,122,466 ("GB '466"). Claim 19 has been rejected under 35 U.S.C. § 102(b) as anticipated by KR 9505692 ("KR '692"). Claims 19 and 21-29 have been rejected under 35 U.S.C. § 103(a) as unpatentable over EP 0415778 ("EP '778").

With respect to the § 102(b) rejections, neither GB '466 nor KR '692 teach each and every limitation of the present invention. Specifically, neither of these references teaches a metal working fluid and neither of these references teach esters according to the present invention having $n = 1.5-10$. Accordingly, Applicants respectfully request reconsideration and withdrawal of these rejections.


With respect to the § 103(a) rejection, the Examiner has failed to provide a *prima facie* case of obviousness. Preliminarily, EP '778, directed to refrigerant lubricants, is not analogous to the metal working fluids of the present invention and one of ordinary skill in the art would not consider EP '778 when seeking to make a metal working fluid. Furthermore, EP '778 does not teach or suggest esters according to the present invention. Specifically, EP '778 does not teach or suggest esters having $n=1.5-10$. Finally, EP '778 does not teach or suggest the additional limitations provided in dependent claims 21-29. Respectfully, the Examiner has failed to meet his burden of establishing a *prima facie* case of obviousness because EP '778 does not teach or suggest each and every limitation of the present invention. Accordingly, Applicants respectfully request reconsideration and withdrawal of this rejection.

Therefore, all objections and rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

Should any issues remain unresolved, the Examiner is encouraged to contact the undersigned attorney for Applicants at the telephone number indicated below in order to expeditiously resolve any remaining issues.

Respectfully submitted,

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